Submitted to:
Clayton State University
2000 Clayton State Blvd.
Morrow, Georgia, 30260

SPILL PREVENTION, CONTROL, AND COUNTERMEASURE PLAN

Clayton State University

2000 Clayton State Blvd.
Morrow, Georgia

Submitted by:

Geosyntec consultants

1255 Roberts Blvd., Suite 200
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June 2021

Site Contact Information:

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1. MANAGEMENT APPROVAL

This Spill Prevention, Control, and Countermeasure (SPCC) Plan (Plan) has the full approval of the owner and operator for Clayton State University (CSU) which operates as a university (the Site or the Facility, as referenced in 40 Code of Federal Regulations [CFR] Part §112) and will be implemented in accordance with 40 CFR §112. Management approval has been extended at a level with authority to commit the necessary resources to implement this Plan.

Pursuant to §112.7(d)(2), this is the written commitment of the CSU to provide the manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful at the Site. This Plan will be fully implemented as herein described and the Plan will be physically maintained at the Site.

Signature:_____ _____
Name: _____ Date
Title: _____

Date of Full Implementation:_____
Management Initials: _____

2. ENGINEERING CERTIFICATION

Pursuant to §112.3(d) and by means of this SPCC certification, I attest that: (i) I am familiar with the requirements of the SPCC rule (40 CFR Part §112); (ii) I, or my agent, have visited and examined the Site; (iii) the Plan has been prepared in general accordance with good engineering practice, including consideration of applicable industry standards, and with the requirements of the SPCC rule; (iv) procedures for required inspections and testing have been established; and (v) the Plan is adequate for the facility with exceptions noted in **Appendix A**.

Signature of Registered Professional Engineer
Tom Wurzinger, P.E.
Registration No. 036193 State: GA

3. GENERAL APPLICABILITY: §112.1

The Oil Pollution Prevention Regulations (40 CFR Part §112) require preparation of an SPCC Plan for facilities that have discharged or could reasonably be expected to discharge "harmful quantities" of oil into or upon navigable waters of the United States or adjoining shorelines. The Oil Discharge Regulations (40 CFR Part §110) define harmful quantities of oil as any amount that affects water quality, causes a film, sheen, or discoloration of the water surface or upon water or adjoining shorelines, or causes a sludge or emulsion to be deposited beneath the surface of the adjoining shorelines.

Specifically, §112.1(d)(2)(ii) requires an SPCC Plan to be developed for a facility where the aggregate storage capacity of oil is greater than 1,320 gallons (by summation of containers with thresholds of 55 gallons or greater). The Site currently houses an aggregate aboveground oil storage quantity greater than 1,320 gallons. This currently includes three (3) bulk-storage containers (with a capacity greater than or equal to 55 gallons), specifically three (3) above ground storage tanks (ASTs) for used oil, unleaded gasoline, and diesel fuel. These ASTs are located at the facility maintenance area and are either double walled or located on a spill pallet. There is no underground storage or piping of petroleum products at the Site.

The Site also utilizes oil-filled operational equipment that include 21 hydraulic elevator systems located within the buildings and 41 pad and pole mounted transformers that store petroleum (i.e. hydraulic fluid and insulating fluid). The electrical transformers owned and operated by Georgia Power or CSU are considered as oil-filled operational equipment for the purposes of this SPCC Plan.

The Site also operates equipment containing oil such as seven natural gas generators, certain elevators systems and trash compactors. These items contain less than 55 gallons of oil and as such, are excluded from this SPCC plan.

The volume of the petroleum in the ASTs, elevator systems, and transformers exceeds the 1,320-gallon capacity that requires an SPCC plan. This SPCC Plan has been developed for the Site in response to the 40 CFR Part §112.

The primary objective of the Plan is to prevent any oil, oil related substances, or hazardous substances from reaching navigable waters of the state. This Plan addresses contingency planning, implementation of operating procedures, and best management practices (BMPs) to prevent and control the discharge of pollutants from spill events as a

result of construction or operation activities. All facilities regulated under 40 CFR Part §112 must conduct an initial screening to determine whether the facility, because of its location, could reasonably be expected to cause substantial harm to the environment and whether the facility is required to develop a Facility Response Plan (FRP) under §112.20. These requirements are not applicable to the Site. The checklist used to certify that these requirements are not applicable is provided in **Appendix B**.

4. SPCC PLAN ADMINISTRATION: §112.3, §112.4, AND §112.5

4.1 Requirement to Prepare: §112.3

Pertinent information related to the Site is listed below:

Name of Operator: Clayton State University

Mailing Address: 2000 Clayton State Blvd., Georgia, GA 30260
Physical Location: 2000 Clayton State Blvd., Georgia, GA 30260

Date of Initial Operation: 1969

In accordance with §112.3(e)(1) and (2), a complete updated copy of this Plan will be maintained at the Site. During normal working hours, the Plan will be available to authorized representatives of federal, state, or local governing agencies for on-site review and a copy will be submitted if requested.

4.2 Amendment by Regional or State Administrator: §112.4

In accordance with §112.4(a), CSU must submit a report to EPA Region VI and the Georgia Environmental Protection Department (GAEPD) whenever requested by the agencies or within 60 days of a discharge of oil into navigable waters, which exceeds 1,000 gallons of oil in a single incident; or 42 gallons of oil in each of two incidents within any consecutive 12-month period. The report must contain the following information:

- §112.4(a)(1): Facility name;
- §112.4(a)(2): Name of designated person accountable for oil spill prevention at facility;
- §112.4(a)(3): Facility location;
- §112.4(a)(4): Maximum storage capacity and daily throughput at facility;
- §112.4(a)(5): Description of corrective action and countermeasures taken;
- §112.4(a)(6): Adequate description of the facility including maps and flow diagrams;

- §112.4(a)(7): Cause of the discharge(s), including an analysis of the failed system;
- §112.4(a)(8): Description of additional preventive measures taken or contemplated to prevent recurrence; and
- §112.4(a)(9): Other pertinent information.

The USEPA Regional Administrator (RA) may require the Plan to be amended:

- After reviewing a report submitted in response to one of the above referenced discharges,
- If the GAEPD recommends the Plan to be amended, or
- Following a USEPA on-site review of the Plan, the agency finds that the Plan does not meet the requirements of 40 CFR §112 or that an amendment is needed to prevent and contain discharges from the Site.

If the USEPA RA proposes, by certified mail or personal delivery, that this Plan be amended, CSU will either: (i) submit arguments and supporting information in response to the proposed amendments within 30 days of receipt of notice; or (ii) amend this Plan within 30 days and implement the amended Plan within 6 months, unless otherwise authorized by the RA.

As required by §112.3(d), technical changes made to the Plan will be certified by a Professional Engineer.

Additionally, according to OCGA §12-14-1, in the event that an oil spill is released in an amount that creates a significant sheen on top of state waters or creates an emulsion or sludge under state water, the release must be reported within 15 minutes to GAEPD Emergency Operations Center 800-241-4113

4.3 SPCC Plan Amendment by Owner/Operator: §112.5

CSU must amend this Plan as needed, if any one of the following events occur:

1. There is a change in facility design, construction, operation, or maintenance that materially affects its potential for discharge to a

waterbody. The following may be considered changes requiring a Plan update:

a. Commissioning or decommissioning fixed storage containers (not portable containers);

b. Replacement, reconstruction, or movement of a fixed storage container;

c. Replacement or reconstruction of portable storage tanks;

d. Construction or demolition of secondary containment structures; or

e. Revisions to standard operating or maintenance procedures.

2. A review of the Plan indicates that more effective field-proven prevention and control technology is available and will significantly reduce the likelihood of a discharge.

CSU must amend the Plan to address such facility modifications prior to or concurrent with the changes being implemented.

In addition, CSU must review the Plan at a minimum once every five years from the date of the last review. The Plan must be amended within 90 days of the review and changes implemented as soon as possible, but no later than six months following the amendment to the Plan. Each routine review must be documented in **Appendix C** and include a signed statement as to whether the Plan was amended. A Professional Engineer must certify any technical amendments to the Plan.

5. SPCC PLAN GENERAL REQUIREMENTS: §112.7

General Requirements for Spill Prevention, Control, and Countermeasure Plans

If you are the owner or operator of a facility subject to this part you must prepare a Plan in accordance with good engineering practices. The Plan must have the full approval of management at a level of authority to commit the necessary resources to fully implement the Plan. You must prepare the Plan in writing. If you do not follow the sequence specified in this section for the Plan, you must prepare an equivalent Plan acceptable to the Regional Administrator that meets all of the applicable requirements listed in this part, and you must supplement it with a section cross-referencing the location of requirements listed in this part and the equivalent requirements in the other prevention plan. If the Plan calls for additional facilities or procedures, methods, or equipment not yet fully operational, you must discuss these items in separate paragraphs, and must explain separately the details of installation and operational start-up.

Section 5.0 of this Plan presents facility-specific details associated with the general requirements for SPCC Plans outlined in §112.7. As previously indicated in *Sections 1.0*, and 2.0, this Plan has been prepared in accordance with good engineering practice, with management approval at a level with authority to commit the necessary resources for full implementation, and in the sequence of the rule.

5.1 General Facility Description

The total area of Clayton State University (the Site) consists of approximately 192 acres located at 2000 Clayton State Blvd. Morrow, GA. The Site is located within Clayton County and consists of eight different parcels. The Site is bound by Trammell Road to the east, Rainwood Apartments to the north, largely by N Lee Street to the west (except a small section the extends beyond the street in the northwest), and residential home to the south. The Site center is located at approximately 33.594376° N and -84.330643° W, approximately 1.5 mile north of the Morrow's city center. The Site location is provided in **Figure 1**.

CSU is a higher-education facility that consists of several buildings (classes, administrative, dorms, maintenance, etc.) that are utilized for university activities. CSU contains low quantities of used oil and fuel, as well as equipment that includes an oil storage reservoir in which the oil is present solely to support the function of the device.

The university also has elevators and transformers. All storage containers or equipment regulated under the SPCC rule are listed in **Table 1** and **Table 2**.

Surface water drains to the southeast toward Swan Lake which is the headwaters of Panther Creek due to the general topography of the Site. The general site layout and the location of storage containers is provided in **Figure 2A** and **Figure 2B**.

5.2 SPCC Plan Conformance and Deviations: §112.7(a)(1) and (2)

> *(a)(1) Include a discussion of your facility's conformance with the requirements listed in this part.*
> *(a)(2) Comply with all applicable requirements listed in this part. Your Plan may deviate from the requirements in paragraphs (g), (h)(2) and (3), and (i) of this section and the requirements in subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c), where applicable to a specific facility, if you provide equivalent environmental protection by some other means of spill prevention, control, or countermeasure. Where your Plan does not conform to the applicable requirements in paragraphs (g),(h)(2) and (3), and (i) of this section, or the requirements of subparts B and C of this part, except the secondary containment requirements in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c), you must state the reasons for nonconformance in your Plan and describe in detail alternate methods and how you will achieve equivalent environmental protection. If the Regional Administrator determines that the measures described in your Plan do not provide equivalent environmental protection, he may require that you amend your Plan, following the procedures in §112.4(d) and (e).*

This Plan conforms with and does not deviate from the requirements of §112.7(a)(1) and (2).

5.3 Facility Layout: §112.7(a)(3)

> *(a)(3) Describe in your Plan the physical layout of the facility and include a facility diagram, which must mark the location and contents of each container. The facility diagram must include completely buried tanks that are otherwise exempted from the requirements of this part under §112.1(d)(4). The facility diagram must also include all transfer stations and connecting pipes.*

The location and contents of pertinent containers, spill kits, and general Site features are provided on **Figures 2A** and **2B**. A summary of the applicable facility containers and their contents are presented in **Table 1** and **Table 2**.

5.4 Oil Storage Capacity: §112.7(a)(3)(i)

> *(a)(3) You must also address in your Plan: (i) The type of oil in each container and its storage capacity;*

A summary of the pertinent containers, substances, and substance quantities located at the Site is provided in **Table 1** and **Table 2**. Three (3) above ground storage tanks (ASTs) for used oil, unleaded gasoline, and diesel fuel are present on-Site. These ASTs are located at the facility maintenance area and are either double walled or located on a spill pallet. Absorbent media and spill mitigation kits are stored nearby.

As described in *Section 3*, the Site includes oil-filled operational equipment (21 hydraulic elevator systems) and electrical transformers containing more than 55-gallons of self-contained oil which are included in this plan. All hydraulic equipment is located on concrete flooring which are free of cracks and expansion joints. Absorbent media and spill kits are available near the elevator rooms. There are 41 electrical transformers that are permanently located at the Site that contain greater than 55-gallons of oil. According to Site personnel, 22 of the electrical transformers are owned by the Facility, while the remainder of the transformers are owned by Georgia Power. Thirty eight of the 41 transformers are staged on an impervious concrete pad for improved leak detection. The three remaining transformers are pole mounted. Absorbent media is readily available if a spill or leak is detected at a piece of staged equipment.

The Site also operates equipment containing small capacities of petroleum such as certain elevators systems and trash compactors. These items contain less than 55 gallons of oil and as such, are excluded from this SPCC plan.

5.5 Discharge Prevention Measures: §112.7(a)(3)(ii)

> *(a)(3) You must also address in your Plan: (ii) Discharge prevention measures including procedures for routine handling of products (loading, unloading, and facility transfers, etc.);*

CSU is applying the use of secondary containment, double-walled tanks, spill pallets, transfer procedures, and the use of readily available spill equipment to prevent discharged oil from reaching navigable waters. This overall approach is practicable and efficient for this facility. The structures and equipment to help prevent a discharge of oil are described in **Table 1, 2, and 3**.

Discharge prevention measures that are currently utilized, or will be implemented at the Site, include the following:

- Written procedures for the transfer of oil and hazardous substances, which include refueling operations (See *Section 5.18*);
- Annual discharge prevention training for operations and maintenance personnel (*Section 5.16*);
- Routine visual inspections of aboveground containers (**Appendix D**);
- Regularly scheduled formal inspections; and
- Preventive maintenance and repair program for oil or oil product storage containers and associated piping (*Section 6.2*).

5.6 Discharge or Drainage Controls: §112.7(a)(3)(iii)

> *(a)(3) You must also address in your Plan: (iii) Discharge or drainage controls such as secondary containment around containers and other structures, equipment, and procedures for the control of a discharge;*

CSU utilizes or will utilize various approved features and procedures for the control of discharges and drainage for the Site. These controls include the following:

- Double-walled storage tank(s);
- Drip pans/Spill pallets;
- Spill kits containing absorbent materials;
- Weekly, Monthly and Quarterly Inspections; and
- Impervious staging pads for improved leak or spill detection.

5.7 Countermeasures for Discharge Discovery, Response, and Cleanup: §112.7(a)(3)(iv)

> *(a)(3) You must also address in your Plan: (iv) Countermeasures for discharge discovery, response, and cleanup (both the facility's capability and those that might be required of a contractor);*

The Site has adequately trained personnel and equipment to contain and clean up minor to moderate volumes of spilled materials. Oil spill response is the responsibility of personnel, who are specifically trained to respond, contain, and clean up minor volumes of spilled materials. Spill control equipment on site includes rolls or blocks of absorbent mats/pads, absorbent booms/"pigs", oil-dry granular absorbent, empty drums, brushes and dust pans, gloves , and a storm drain cover **(Table 3).** Spill equipment is contained in two large spill kits located at the facilities maintenance building, as well as in multiple smaller mobile kits maintained at the maintenance building (**Figures 2A**). Small spill kits are also located in each elevator closet. Spills will be evaluated by authorized personnel who will determine the required response and notification of an outside emergency response contractor, if necessary.

In case of a spill, **Appendix F** should be referenced for oil spill incident notification phone numbers and oil spill contingency plan. A Spill Report must then be completed and shall be maintained in **Appendix F**. For spills into streams, lakes, or other waterbodies containing standing or flowing water, regardless of size, the Site must notify the GAPED's Emergency Operations Center within 15 minutes and National Response

Center (NRC) within one hour. Contact information for the NRC as well as additional information for State reporting is included in **Appendix F**.

5.8 Recovered Materials Disposal: §112.7(a)(3)(v)

> *(a)(3) You must also address in your Plan: (v) Methods of disposal of recovered materials in accordance with applicable legal requirements;*

Materials recovered during a spill event will be containerized appropriately. Soils and other solids will be placed in 55-gallon drums or roll-off containers, as warranted. Liquids will be placed in 55-gallon drums or will be collected in a vacuum truck using industrial power vacuuming. Recovered materials will be labeled, characterized, and disposed/recycled in accordance with applicable federal, state, and local regulations.

5.9 Contact List and Notification Phone Numbers: §112.7(a)(3)(vi)

> *(a)(3) You must also address in your Plan: (vi) Contact list and phone numbers for the facility response coordinator, National Response Center, cleanup contractors with whom you have an agreement for response, and all appropriate Federal, State, and local agencies who must be contacted in case of a discharge as described in §112.1(b).*

The contact list for spill response activities is provided in **Appendix G** of this Plan.

5.10 Reporting and Notification Procedures: §112.7(a)(4)

> *(a)(4) Unless you have submitted a response plan under §112.20, provide information and procedures in your Plan to enable a person reporting a discharge as described in §112.1(b) to relate information on the exact address or location and phone number of the facility; the date and time of the discharge, the type of material discharged; estimates of the total quantity discharged; estimates of the quantity discharged as described in §112.1(b); the source of the discharge; a description of all affected media; the cause of the discharge; any damages or injuries caused by the discharge; actions being used to stop, remove, and mitigate the effects of the discharge; whether an evacuation may be needed; and, the names of individuals and/or organizations who have also been contacted.*

The Site has developed reporting and notification procedures that should be followed in the event of a spill at the Site (see **Appendix F**). These procedures also address applicable state and federal reporting and notification requirements. The Spill Coordinator, Alternate Spill Coordinator, or EH&S Coordinator should be consulted if there are any questions concerning proper reporting and notification protocol.

5.11 Spill Response Procedures: §112.7(a)(5)

> *(a)(5) Unless you have submitted a response plan under §112.20, organize portions of the Plan describing procedures you will use when a discharge occurs in a way that will make them readily usable in an emergency, and include appropriate supporting material as appendices.*

In the event of an oil or fuel spill, the Oil Spill Contingency Plan, Reporting, and Notification Procedure provided in **Appendix F** shall be followed. The procedure outlines response management structure, initial response steps, reporting requirements, follow-up activities, and sustained actions for implementation following a spill or other release.

5.12 Discharge Analysis: §112.7(b)

> *(b) Where experience indicates a reasonable potential for equipment failure (such as loading or unloading equipment, tank overflow, rupture, or leakage, or any other equipment known to be a source of a discharge), include in your Plan a prediction of the direction, rate of flow, and total quantity of oil which could be discharged from the facility as a result of each type of major equipment failure.*

Based on the materials stored and processes utilized at the facility, spill mitigation procedures and response guidelines address the following scenarios:

- Tank puncture/leak;
- Spills from transfer of diesel, gas, or used oil (tank refilling, etc.);
- Failure of transfer equipment or hoses, as appropriate;
- Tank overfill/failure;

- Double-wall failure;
- Explosion and/or fire; and
- Equipment failure (e.g., internal pumping system failure).

Predictions of the direction, rate of flow, and total quantity of substances that could be discharged from the facility storage are presented in **Table 4**.

5.13 Spill Containment: §112.7(c)

> *(c) Provide appropriate containment and/or diversionary structures or equipment to prevent a discharge as described in §112.1(b). The entire containment system, including walls and floor, must be capable of containing oil and must be constructed so that any discharge from a primary containment system, such as a tank or pipe, will not escape the containment system before cleanup occurs. At a minimum, you must use one of the following prevention systems or its equivalent:*
>
> *(1) For onshore facilities: (i) Dikes, berms, or retaining walls sufficiently impervious to contain oil; (ii) Curbing; (iii) Culverting, gutters, or other drainage systems; (iv) Weirs, booms, or other barriers; (v) Spill diversion ponds; (vi) Retention ponds; or (vii) Sorbent materials.*
>
> *(2) For offshore facilities: (i) Curbing or drip pans; or (ii) Sumps and collection systems.*

CSU is applying the use of secondary containment, double-walled tanks, spill pallets, transfer procedures, and the use of a contingency plan (Appendix F) and readily available spill equipment to prevent discharged oil from reaching navigable waters. Elevators present in the building interiors are utilizing the impervious concrete elevator shaft within the building for containment. This overall approach is practicable and efficient for this facility. The structures and equipment to help prevent a discharge of oil are discussed in *Section 5.5*.

5.14 Spill Containment Practicability: §112.7(d)

(d) If you determine that the installation of any of the structures or pieces of equipment listed in paragraphs (c) and (h)(1) of this section, and §§112.8(c)(2), 112.8(c)(11), 112.9(c)(2), 112.10(c), 112.12(c)(2), 112.12(c)(11), 112.13(c)(2), and 112.14(c) to prevent a discharge as described in §112.1(b) from any onshore or offshore facility is not practicable, you must clearly explain in your Plan why such measures are not practicable; for bulk storage containers, conduct both periodic integrity testing of the containers and periodic integrity and leak testing of the valves and piping; and, unless you have submitted a response plan under §112.20, provide in your Plan the following:

(1) An oil spill contingency plan following the provisions of part 109 of this chapter.

(2) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

Secondary containment and other SPCC requirements are practical for bulk storage containers and elevators at CSU. Sized secondary containment for oil-filled operational equipment (transformers) is not practical at all locations across CSU. The facility will use a contingency plan in lieu of the general secondary containment requirement for the on-site transformers. No discussions beyond this deviation related to practicability are warranted because this Plan does not deviate from the requirements of §112.7(c), §112.7(h)(1), §112.8(c)(2), §112.8(c)(11), §112.9(c)(2), §112.10(c), §112.12(c)(2), and §112.12(c)(11).

5.15 Inspections, Tests, and Records: §112.7(e)

(e) Inspections, tests, and records. Conduct inspections and tests required by this part in accordance with written procedures that you or the certifying engineer develop for the facility. You must keep these written procedures and a record of the inspections and tests, signed by the appropriate supervisor or inspector, with the SPCC Plan for a period of three years. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

Inspections are conducted weekly, monthly, and /or quarterly and are documented. Inspections are performed as follows.

- Weekly Inspections: ASTs and drums - A CSU maintenance employee inspects ASTs and drums at facility maintenance, and logs findings on an inspection sheet (**Appendix D**).

- Monthly Inspections: Elevators - A CSU employee inspects all elevators for deterioration, corrosion, or leaks.

- Quarterly Inspections: Transformers and Spill Kits/Spill Response Supplies - A CSU employee inspects all transformers (those owned by CSE as well as those owned by Georgia Power) for deterioration, corrosion, or leaks. Georgia Power has documented to CSU via letter that they will respond to any oil spill originating from their transformers as per CFR 761.125 and the State of Georgia Oil and Hazardous Substance Release Act of 1991 (**Appendix E**). In addition, spill kits are inspected for accurate and sufficient contents. Findings are documented on inspection forms found in **Appendix D**.

Any oil-filled operational equipment, waste oil, fuel, or hydraulic fluid containers, and piping problems are immediately reported to the Director of Facilities Management. Equipment oil spills (leaks) that cause a loss of oil from tank walls, piping or other components are repaired or replaced as soon as possible to prevent the potential for a major spill from the source. This is especially important for sources located outside or near drains or catch basins that discharge to the environment.

Inspection checklists are included in **Appendix D**. An inspection checklist sheet shall be signed and dated and remain on file in facilities management for five years plus the current year. The Director of Facilities Management is responsible for maintaining them with this SPCC Plan. Employees at the facility who have been trained and are familiar with the equipment shall be responsible for conducting these inspections.

Maintenance records will be kept of periodic integrity testing as well as other repair or alteration work on the tank for a period of not less than three years. Visual inspections are conducted by Facility personnel on a routine basis to observe signs of deterioration, potential leaks, and the accumulation of material. A full discussion integrity testing protocol for containers addressed by this Plan is provided in *Section 6.2*. Written

inspection procedures for storage containers are provided in **Appendix D**. Documentation of formal inspections or inspections noting deficiencies are maintained on file at the Facility Building and will be kept for a period of three years.

5.16 Personnel Training and Discharge Prevention Procedures: §112.7(f)

> *(f) Personnel, training, and discharge prevention procedures.*
> *(1) At a minimum, train your oil-handling personnel in the operation and maintenance of equipment to prevent discharges; discharge procedure protocols; applicable pollution control laws, rules, and regulations; general facility operations; and, the contents of the facility SPCC Plan.*
> *(2) Designate a person at each applicable facility who is accountable for discharge prevention and who reports to facility management.*
> *(3) Schedule and conduct discharge prevention briefings for your oil-handling personnel at least once a year to assure adequate understanding of the SPCC Plan for that facility. Such briefings must highlight and describe known discharges as described in §112.1(b) or failures, malfunctioning components, and any recently developed precautionary measures.*

CSU provides SPCC spill training to oil-handling employees to ensure that they are properly instructed in the operation and maintenance of equipment to prevent oil discharges, discharge procedures protocols, general facility operations, the contents of the facility SPCC Plan, and applicable pollution control laws, rules, and regulations.

Facilities Management will conduct annual training which includes the following training topics:

- Introduction to pollution control laws;
- Rules and regulations pertaining to the use and storage of oil products;
- Inspection, operation and maintenance of spill equipment, and oil storage and dispensing equipment;
- Spill response and cleanup;
- Spill notification and record keeping; and

- Spill prevention practices.

Records of attendance at training and topics covered are maintained by Facilities Management. The annual SPCC training is documented and includes the instructor's name, course outline, date and duration of training, attendant's names and signatures, and a corrective action list of SPCC Plan areas in need of improvement that were discussed, if any (**Appendix H**). This information is filed and maintained for at least three years at Facilities Management. A Certificate of Training is presented to each CSU employee that has completed the training. Facilities Management forwards a copy of this certificate to the Human Resource Department for inclusion in the employee's file.

5.17 Security: §112.7(g)

(g) Security (excluding oil production facilities).
(1) Fully fence each facility handling, processing, or storing oil, and lock and/or guard entrance gates when the facility is not in production or is unattended.
(2) Ensure that the master flow and drain valves and any other valves permitting direct outward flow of the container's contents to the surface have adequate security measures so that they remain in the closed position when in non-operating or non-standby status.
(3) Lock the starter control on each oil pump in the "off" position and locate it at a site accessible only to authorized personnel when the pump is in a non- operating or non-standby status.
(4) Securely cap or blank-flange the loading/unloading connections of oil pipelines or facility piping when not in service or when in standby service for an extended time. This security practice also applies to piping that is emptied of liquid content either by draining or by inert gas pressure.
(5) Provide facility lighting commensurate with the type and location of the facility that will assist in the: (i) Discovery of discharges occurring during hours of darkness, both by operating personnel, if present, and by non-operating personnel (the general public, local police, etc.); and (ii) Prevention of discharges occurring through acts of vandalism.

CSU has established security measures for the entire university which includes where oil is handled and/or stored. While the entire university cannot be fenced, the site is monitored and patrolled 24 hours per day by university security. Access to the maintenance area (oil storage area and fueling station) is controlled by both fencing and

general security patrol during both operating and non-operating hours. Elevator closets and transformers are always kept locked.

Lighting and security are adequate to detect spills during hours of darkness and sufficient to deter acts of vandalism that may result in the discharge of substances. Maintenance personnel that are on-site during normal working hours further improve the prompt detection and control of spills or leaks.

Master flow and drain valves are not utilized to control flow at the Facility.

5.18 Facility Tank Car and Tank Truck Loading/Unloading: §112.7(h)

> *(h) Facility tank car and tank truck loading/unloading rack (excluding offshore facilities).*
> *(1) Where loading/unloading area drainage does not flow into a catchment basin or treatment facility designed to handle discharges, use a quick drainage system for tank car or tank truck loading and unloading areas. You must design any containment system to hold at least the maximum capacity of any single compartment of a tank car or tank truck loaded or unloaded at the facility.*
> *(2) Provide an interlocked warning light or physical barrier system, warning signs, wheel chocks, or vehicle break interlock system in loading/unloading areas to prevent vehicles from departing before complete disconnection of flexible or fixed oil transfer lines.*
> *(3) Prior to filling and departure of any tank car or tank truck, closely inspect for discharges the lowermost drain and all outlets of such vehicles, and if necessary, ensure that they are tightened, adjusted, or replaced to prevent liquid discharge while in transit.*

CSU receives a tank truck for refilling the 500-gallon gasoline AST, a truck for filling the 110- gallon diesel AST, and a truck for removing used oil from the 250-gallon AST. CSU has an employee overseeing all truck unloading operations. The CSU employee shall ensure that, while on CSU property, the carrier follows all codes of federal regulations regarding the transportationof materials. CSU will ensure that the unloading truck is equipped with and properly uses handbrakes (parking brakes) or brake locking devices before unloading.

CSU will ensure that drivers immediately set parking brake and secure trailer with chock blocks. The CSU attendant must verify that the product on the truck is the correct product and grade to use in filling the tank. Prior to and after filling, the CSU attendant will oversee measuring and verify the level of tank contents. Adjustments must be made if the amount of product ordered exceeds the fill level of the tank. The CSU representative also reviews the tank monitor and the amount of fuel is entered into the inventory management system. The CSU attendant will verify that all fittings, hoses, and seals are in good condition (free of leaks, properly aligned, and correctly fitted) prior to unloading product. A CSU attendant must be present while the lines are being connected and disconnected.

When applicable, the CSU attendant will ensure that a proper ground connection is made first before any other connection is made. To make a proper ground connection you must: connect the ground cable, connect the proper unloading hoses(s), ensure that the valves are lined open correctly, ensure that the valves are lined closed correctly, vent the pressure off of the unloading hose(s) prior to disconnecting, return the unloading hose(s) to original position, return the ground cable to the original position, and complete the required paperwork before leaving the property. Attempting to cause a false ground by tampering with the ground system will cause the driver's unloading privileges to be immediately suspended. A true ground must be established from your truck to the grounding system.

Drivers and passengers will be directed to remain with the vehicle unless authorized to leave the vehicle by a designated CSU representative. A CSU authorized employee and transport personnel will be present when connecting and disconnecting. Note: the driver will be directed to remain outside the vehicle, but in the unloading areas during connecting, unloading, and disconnecting.

The CSU attendant will ensure that the driver provides means for collecting product lost in the disconnecting process. A bucket is provided by CSU for this purpose if the driver does not have one available. Any residual oil is collected and comingled with other waste oil for disposal. Disposal practices will be in accordance with local, state, and federal regulations.

5.19 Brittle Fracture Analysis: §112.7(i)

(i) If a field-constructed aboveground container undergoes a repair, alteration, reconstruction, or a change in service that might affect the risk of a discharge or failure due to brittle fracture or other catastrophe, or has discharged oil or failed due to brittle fracture failure or other catastrophe, evaluate the container for risk of discharge or failure due to brittle fracture or other catastrophe, and as necessary, take appropriate action.

There are no field-constructed aboveground containers at the Site that are used to store oil or oil products; therefore, the requirements of §112.7(i) do not apply.

5.20 Applicable Requirements: §112.7(j)

(j) In addition to the minimal prevention standards listed under this section, include in your Plan a complete discussion of conformance with the applicable requirements and other effective discharge prevention and containment procedures listed in this part or any applicable more stringent State rules, regulations, and guidelines.

Section 6.0 of this Plan provides further detailed discussions of conformance with the applicable requirements and other effective discharge prevention used at the Site.

5.21 Qualified Oil-Filled Equipment: §112.7(k)

§112.7: (k) Qualified Oil-filled Operational Equipment. The owner or operator of a facility with oil-filled operational equipment that meets the qualification criteria in paragraph (k)(1) of this sub-section may choose to implement for this qualified oil-filled operational equipment the alternate requirements as described in paragraph (k)(2) of this subsection in lieu of general secondary containment required in paragraph (c) of this section.

(1) Qualification Criteria – Reportable Discharge History: The owner or operator of a facility that has had no single discharge as described in 112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges as described in 112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan certification date, or since becoming subject to this part if the facility has been in operation for less than three years (other than oil-filled discharges as described in 112.1(b) that are the result of natural disasters, acts of war or terrorism); and (2) Alternative Requirements to General Secondary Containment. If secondary containment is not provided for qualified oil-filled operational equipment pursuant to paragraph (c) of this section, the owner or operator of a facility with qualified oil-filled operational equipment must: (i) Establish and document the facility procedures or inspections or a monitoring program to detect equipment failure and /or a discharge; and (ii) Unless you have submitted a response plan under 112.20, provide in your Plan the following: (A) An oil spill contingency plan following the provisions of part 109 of this chapter. (B) A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful.

The facility utilizes oil-filled operational equipment (41 electrical transformers, 21 elevator hydraulic reservoirs that exceed the 55-gallons of oil storage capacity) and meets the qualifying criteria for this portion of the regulation in that it has *"had no single discharge as described in §112.1(b) from any oil-filled operational equipment exceeding 1,000 U.S. gallons or no two discharges as described in §112.1(b) from any oil-filled operational equipment each exceeding 42 U.S. gallons within any twelve month period in the three years prior to the SPCC Plan certification date.*"

The facility will use a contingency plan in lieu of the general secondary containment requirement for the 41 electrical transformers. Pursuant to 40 CFR 112.7(k), a determination of impracticality is not needed for these types of sources. An "Oil Spill Contingency Plan" is provided in **Appendix F** to help prevent an oil discharge from the transformers owned and operated by CSU. The contingency plan is written based on the criteria identified in 40 CFR 109.5. A written commitment of manpower, equipment, and materials required to expeditiously control and remove any quantity of oil discharged that may be harmful is provided in *Section 1*. It is noted that there are several transformers located on the CSU campus that are not owned or operated by CSU, therefore CSU will provide begin containment procedures and notification to the transformer owner/operator (Georgia Power) in the event a release is detected.

The facility establishes a routine inspection program to detect equipment failure to expeditiously control and remove any quantity of oil discharged that may be harmful, as stated in *Section 1.0* of this plan. The written inspection program can be found in **Appendix D** of this Plan.

6. REQUIREMENTS FOR ONSHORE (NON-PRODUCTION) FACILITIES: §112.8

If you are the owner or operator of an onshore facility (excluding a production facility), you must: (a) Meet the general requirements for the Plan listed under §112.7, and the specific discharge prevention and containment procedures listed in this section.

This Plan conforms with and does not deviate from the requirements of 40 CFR §112.7 except otherwise described in **Appendix A**. Section 6.0 of this Plan presents facility-specific details associated with the requirements for onshore non-production facilities outlined in §112.8.

6.1 Facility Drainage: §112.8(b)

(b)(1) Restrain drainage from diked storage areas by valves to prevent a discharge into the drainage system or facility effluent treatment system, except where facility systems are designed to control such discharge. You may empty diked areas by pumps or ejectors; however, you must manually activate these pumps or ejectors and must inspect the condition of the accumulation before starting, to ensure no oil will be discharged.
(b)(2) Use valves of manual, open-and-closed design, for the drainage of diked areas. You may not use flapper-type drain valves to drain diked areas. If your facility drainage drains directly into a watercourse and not into an on-site wastewater treatment facility, you must inspect and may drain uncontaminated retained stormwater, as provided in paragraphs (c)(3)(ii), (iii), and (iv) of this section.

No diked storage areas are utilized at the Site. Therefore, details associated with the requirements outlined in §112.8(b)(1-2) do not apply.

(b)(3) Design facility drainage systems from undiked areas with a potential for a discharge (such as where piping is located outside containment walls or where tank truck discharges may occur outside the loading area) to flow into ponds, lagoons, or catchment basins designed to retain oil or return it to the facility. You must not locate catchment basins in areas subject to periodic flooding.

The facility will not use controlled drainage to satisfy the general secondary containment requirements of the SPCC rule, where oil handling occurs outside of containment. Therefore, the provisions of this section are not applicable to the facility. The facility will utilize active containment measures, such as spill response equipment (drain mats, absorbent booms, etc.) to provide active containment for spills occurring outside of areas with secondary containment. The facility does not treat water routed to outdoor (storm water) drains.

6.2 Bulk Storage Containers: §112.8(c)

Aboveground containers that qualify as bulk storage containers, used for the storage of oil and oil products at the Site, are limited to the three ASTs with double-walled containment or spill pallets. Therefore, the following discussion pertaining to the requirements of federal regulations is limited to these containers.

> *(c)(1) Not use a container for the storage of oil unless its material and construction are compatible with the material stored and conditions of storage such as pressure and temperature.*

All construction materials for bulk storage tanks, associated piping and valves, and other appurtenances are compatible with stored products. Temperature, pressure, concentration, trace contaminants, shelf life, vapor/liquid interfaces, and other characteristics are considered when selecting and inspecting storage containers.

> *(c)(2) Construct all bulk storage container installations so that you provide a secondary means of containment for the entire capacity of the largest single container and sufficient freeboard to contain precipitation. You must ensure that diked areas are sufficiently impervious to contain discharged oil. Dikes, containment curbs, and pits are commonly employed for this purpose. You may also use an alternative system consisting of a drainage trench enclosure that must be arranged so that any discharge will terminate and be safely confined in a facility catchment basin or holding pond.*

The immobile, ASTs located at the Site are double-walled or located on a spill pallet and located on impervious concrete pads.

> *(c)(3) Not allow drainage of uncontaminated rainwater from the diked area into a storm drain or discharge of an effluent into an open watercourse, lake, or pond, bypassing the facility treatment system unless you: (i) Normally keep the bypass valve sealed closed. (ii) Inspect the retained rainwater to ensure that its presence will not cause a discharge as described in §112.1(b). (iii) Open the bypass valve and reseal it following drainage under responsible supervision; and (iv) Keep adequate records of such events, for example, any records required under permits issued in accordance with §§122.41(j)(2) and 122.41(m)(3) of this chapter.*

Any rainwater accumulation in the spill pallet for the diesel transfer tank (although unlikely since it is stored under cover) shall be manually pumped and poured back into the used oil AST. There are no drains in the spill pallet or the containment berm

> *(c)(4) Protect any completely buried metallic storage tank installed on or after January 10, 1974 from corrosion by coatings or cathodic protection compatible with local soil conditions. You must regularly leak test such completely buried metallic storage tanks.*

The Site has no buried metal storage tanks that are subject to 40 CFR 112; therefore, the requirements of §112.8(c)(4) do not apply.

> *(c)(5) Not use partially buried or bunkered metallic tanks for the storage of oil, unless you protect the buried section of the tank from corrosion. You must protect partially buried and bunkered tanks from corrosion by coatings or cathodic protection compatible with local soil conditions.*

The Site has no partially buried or bunkered metal storage tanks as addressed by this Plan; therefore, the requirements of §112.8(c)(5) do not apply.

(c)(6) Test each aboveground container for integrity on a regular schedule, and whenever you make material repairs. The frequency of and type of testing must take into account container size and design (such as floating roof, skid-mounted, elevated, or partially buried). You must combine visual inspection with another testing technique such as hydrostatic testing, radiographic testing, ultrasonic testing, acoustic emissions testing, or another system of non-destructive shell testing. You must keep comparison records and you must also inspect the container's supports and foundations. In addition, you must frequently inspect the outside of the container for signs of deterioration, discharges, or accumulation of oil inside diked areas. Records of inspections and tests kept under usual and customary business practices will suffice for purposes of this paragraph.

Inspections: The ASTs are inspected every week (and at fueling) to identify leaks. Elevators are inspected monthly and transformers are inspected quarterly to identify leaks. Any leaks are referred to the Director of Facilities Management for immediate repair, or in the case of an elevator leak, to the elevator maintenance firm. If any leaks originate from CSU or Georgia Power owned transformers, CSU personnel will make immediate efforts to contain the release and Georgia Power will be contacted for cleanup, as Georgia Power has assumed maintenance responsibility of the transformers located on the CSU property. Any spilled oil will be cleaned up by trained CSU or Georgia Power personnel and disposed of in accordance with applicable regulations. Oil mobile spill clean-up supplies are located at the maintenance building.

Integrity Testing: The 500-gallon gasoline AST and 250-gallon used oil AST are constructed of steel. The 110-gallon diesel tank is of aluminum alloy construction. Due to their size and material, the ASTs are visually inspected weekly. Integrity testing may consist of visual inspection, hydrostatic testing, ultrasonic thickness testing, and/or equivalent integrity testing method by a qualified individual and will address tank supports, foundations, piping and valves. The periodic visual inspections are sufficient and provide equivalent environmental protection for the following reasons: 1) the containers are on concrete foundations and are visible on all sides; 2) internal corrosion poses minimal risk of failure; and 3) periodic visual inspections of the containers are sufficient to detect and promptly correct leaks associated with the integrity of these containers.

Records: Records are maintained for a period of not less than three years and can be found at the Site.

(c)(7) Control leakage through defective internal heating coils by monitoring the steam return and exhaust lines for contamination from internal heating coils that discharge into an open watercourse, or pass the steam return or exhaust lines through a settling tank, skimmer, or other separation or retention system.

There are no internal heating coils associated with aboveground tanks at the Site; therefore, the requirements of §112.8(c)(7) do not apply.

(c)(8) Engineer or update each container installation in accordance with good engineering practice to avoid discharges. You must provide at least one of the following devices: (i) High liquid level alarms with an audible or visual signal at a constantly attended operation or surveillance station. In smaller facilities an audible air vent may suffice. (ii) High liquid level pump cutoff devices set to stop flow at a predetermined container content level. (iii) Direct audible or code signal communication between the container gauger and the pumping station. (iv) A fast response system for determining the liquid level of each bulk storage container such as digital computers, telepulse, or direct vision gauges. If you use this alternative, a person must be present to monitor gauges and the overall filling of bulk storage containers. (v) You must regularly test liquid level sensing devices to ensure proper operation.

The 500-gallon gasoline AST does have high liquid level alarms and a high liquid level pump cutoff device set to stop flow at a predetermined container content level. In addition, it has a low-level alarm in order to detect a leak from the tank. A log is also maintained so that the amount leaving and entering the tank is tracked. Offloading of diesel fuel is overseen by a trained CSU employee, who ensures that the tank is not overfilled. The driver and CSU employee will be within a short visual distance of each other during the filling procedure to allow for direct communication.

(c)(9) Observe effluent treatment facilities frequently enough to detect possible system upsets that could cause a discharge as described in §112.1(b).

The Site does not have a wastewater treatment plant; therefore, the requirements of §112.8(c)(9) do not apply.

(c)(10) Promptly correct visible discharges which result in a loss of oil from the container, including but not limited to seams, gaskets, piping, pumps, valves, rivets, and bolts. You must promptly remove any accumulations of oil in diked areas.

The ASTs are inspected every week (and at fueling) to identify leaks. Elevators are inspected monthly and transformers are inspected quarterly to identify leaks. Any leaks are referred to the Director of Facilities Management for immediate repair, or in the case of an elevator leak, to the elevator maintenance firm. If any leaks originate from CSU or Georgia Power owned transformers, CSU will begin containment measures and Georgia Power will be contacted for further containment and cleanup, as Georgia Power has assumed maintenance responsibility of the transformers located on the CSU property. Any spilled oil will be cleaned up by trained CSU and/or Georgia Power personnel and disposed of in accordance with applicable regulations. Oil spill clean-up supplies are located throughout the university grounds.

(c)(11) Position or locate mobile or portable oil storage containers to prevent a discharge as described in §112.1(b). You must furnish a secondary means of containment, such as a dike or catchment basin, sufficient to contain the capacity of the largest single compartment or container with sufficient freeboard to contain precipitation.

Any portable containers of oil are maintained and stored indoors and on a spill pallet.

6.3 Facility Transfer Operations, Pumping, and Facility Process: §112.8(d)

(d)(1) Provide buried piping that is installed or replaced on or after August 16, 2002, with a protective wrapping and coating. You must also cathodically protect such buried piping installations or otherwise satisfy the corrosion protection standards for piping in part 280 of this chapter or a State program approved under part 281 of this chapter. If a section of buried line is exposed for any reason, you must carefully inspect it for deterioration. If you find corrosion damage, you must undertake additional examination and corrective action as indicated by the magnitude of the damage.
(d)(2) Cap or blank-flange the terminal connection at the transfer point and mark it as to origin when piping is not in service or is in standby service for an extended time.
(d)(3) Properly design pipe supports to minimize abrasion and corrosion and allow for expansion and contraction.
(d)(4) Regularly inspect all aboveground valves, piping, and appurtenances. During the inspection you must assess the general condition of items, such as flange joints, expansion joints, valve glands and bodies, catch pans, pipeline supports, locking of valves, and metal surfaces. You must also conduct integrity and leak testing of buried piping at the time of installation, modification, construction, relocation, or replacement.
(d)(5) Warn all vehicles entering the facility to be sure that no vehicle will endanger aboveground piping or other oil transfer operations.

The Site does not have underground or aboveground oil containing transfer piping; therefore, the requirements of §112.8(d) do not apply.

7. REQUIREMENTS FOR ONSHORE OIL PRODUCTION FACILITIES: §112.9

The Site is not an onshore oil production facility. Consequently, the provisions in §112.9 do not apply.

8. REQUIREMENTS FOR ONSHORE OIL DRILLING AND WORKOVER FACILITIES: §112.10

The Site is not an onshore oil drilling or workover facility. Consequently, the provisions in §112.10 do not apply.

9. REQUIREMENTS FOR OFFSHORE OIL DRILLING, PRODUCTION, AND WORKOVER FACILITIES: §112.11

The Site is not an offshore oil drilling, production, or workover facility. Consequently, the provisions in §112.11 do not apply.

10. REQUIREMENTS FOR ANIMAL FATS AND OILS AND GREASES, AND FISH AND MARINE MAMMAL OILS; AND FOR VEGETABLE OILS, INCLUDING OILS FROM SEEDS, NUTS, FRUITS, AND KERNELS: §112.12

The Site does not store the types of oil referenced by §112.12 in regulated bulk storage containers. Consequently, the provisions in §112.12 do not apply.

TABLE

Table 1: Facility Owned Oil or Hazardous Substance-Containing Containers, Storage Capactities, and Secondary Containment
Clayton State University, Morrow, GA

Building Name/Container Location	Tank/Container Type	Map ID	Field ID	Owner	Contents	Total Capacity (gallons)	Secondary Containment
Facilities Management	Above Ground Storage Tank	AST-1	AST-1	CSU	Used Oil	250	Double Walled Tank. Inside spill containment berm. Located under cover.
Facilities Management	Above Ground Storage Tank	AST-2	AST-2	CSU	Unleaded Gasoline	500	Double Walled Tank. A spill kit is stationed adjacent to tank for a quick response. The tank is equipt with a float switch. A spill/discharge would pour onto concrete pad and flow toward a nearby storm drain.
Facilities Management	Above Ground Storage Tank	AST-3	AST-3	CSU	Diesel Fuel	110	Located on a spill pallet and under cover.
Harry S. Downs Center (School of Nursing)	Elevator (Freight)	E-1	E-1	CSU	Hydraulic Fluid	100	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Harry S. Downs Center (School of Nursing)	Elevator (Passenger)	E-2	E-2	CSU	Hydraulic Fluid	100	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Spivey Hall	Elevator (Passenger)	E-3	E-3	CSU	Hydraulic Fluid	100	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Spivey Hall	Elevator (Freight)	E-4	E-4	CSU	Hydraulic Fluid	100	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Spivey Hall	Elevator (Stage Lift)	E-5	E-5	CSU	Hydraulic Fluid	250	The building's concrete floors and walls act as secondary containment. Spill kit present. Approximately 1'x1'x1' sump present that was holding water.
Music Education	Elevator (Passenger)	E-6	E-6	CSU	Hydraulic Fluid	105	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Student Activity Center	Elevator (Passenger)	E-7	E-7	CSU	Hydraulic Fluid	150	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
James M. Bakers University Center	Elevator (Passenger)	E-8	E-8	CSU	Hydraulic Fluid	300	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Library	Elevator (Passenger)	E-9	E-9	CSU	Hydraulic Fluid	300	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment. Spill kit present.
Library	Elevator (Freight)	E-10	E-10	CSU	Hydraulic Fluid	425	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
James M. Bakers University Center	Elevator (Passenger)	E-11	E-11	CSU	Hydraulic Fluid	200	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
James M. Bakers University Center	Elevator (Freight)	E-12	E-12	CSU	Hydraulic Fluid	200	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Clayton Hall	Elevator (Passenger)	E-13	E-13	CSU	Hydraulic Fluid	125	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment. Spill kit present. Floor drain present.
Arts and Sciences	Elevator (Passenger)	E-14	E-14	CSU	Hydraulic Fluid	70	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Student Center	Elevator (Freight)	E-15	E-15	CSU	Hydraulic Fluid	80	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Student Center	Elevator (Passenger)	E-16	E-16	CSU	Hydraulic Fluid	100	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Laker Hall	Elevator (Passenger)	E-17	E-17	CSU	Hydraulic Fluid	100	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.

Table 1: Facility Owned Oil or Hazardous Substance-Containing Containers, Storage Capactities, and Secondary Containment
Clayton State University, Morrow, GA

Building Name/Container Location	Tank/Container Type	Map ID	Field ID	Owner	Contents	Total Capacity (gallons)	Secondary Containment
Annex-LAB	Elevator (Passenger)	E-18	E-18	CSU	Hydraulic Fluid	80	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
CSU-East Administration Bldg.	Elevator (Passenger)	E-19	E-19	CSU	Hydraulic Fluid	80	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment. Spill kit present.
CSU East Multi-purpose Bldg.	Elevator (Passenger)	E-20	E-20	CSU	Hydraulic Fluid	80	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment.
Science Building	Elevator (Freight)	E-21	E-21	CSU	Hydraulic Fluid	180	Equipment inside a locked room. The building's concrete floors and walls act as secondary containment. Approximately 2'x2'x1' floor sump present. Floor drain present outside the door.
Central Plant	Transformer	T-10	T-10	CSU	Mineral Oil	255	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Student Activity Center Loading Dock	Transformer	T-11	T-20	CSU	Mineral Oil	306	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Music Education Loading Dock	Transformer	T-12	T-17	CSU	Mineral Oil	355	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Student Center Loading Dock	Transformer	T-13	T-13	CSU	Mineral Oil	429	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
UC Loading Dock	Transformer	T-14	T-2	CSU	Mineral Oil	493	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Athletic and Fitness Building	Transformer	T-15	T-1	CSU	Mineral Oil	186	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Technology / Clayton Hall	Transformer	T-18	T-4	CSU	Mineral Oil	235	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Lakeview Discovery & Science Center	Transformer	T-37	T-9	CSU	Mineral Oil	476	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Continuing Education	Transformer	T-1	T-18	CSU	Mineral Oil	211	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Facility Management (Loading Dock)	Transformer	T-2	T-7	CSU	Mineral Oil	183	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Administration / Faculty Hall	Transformer	T-3	T-15	CSU	Mineral Oil	183	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Tennis Courts/Soccer Field	Transformer	T-4	T-19	CSU	Mineral Oil	211	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
School of Business	Transformer	T-5	T-3	CSU	Mineral Oil	215	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Arts and Sciences	Transformer	T-6	T-5	CSU	Mineral Oil	230	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Lower Library (Near Carts)	Transformer	T-8	T-14	CSU	Mineral Oil	255	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Central Plant	Transformer	T-9	T-11	CSU	Mineral Oil	255	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.

Table 1: Facility Owned Oil or Hazardous Substance-Containing Containers, Storage Capactities, and Secondary Containment
Clayton State University, Morrow, GA

Building Name/Container Location	Tank/Container Type	Map ID	Field ID	Owner	Contents	Total Capacity (gallons)	Secondary Containment
Central Plant	Transformer	T-9	T-12	CSU	Mineral Oil	255	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Athletic and Fitness Building	Transformer	T-38	T-22	CSU	Mineral Oil	255	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Athletic and Fitness Building	Transformer	T-39	123151	CSU	Mineral Oil	306	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Laker Hall	Transformer	T-16	340989	CSU	Mineral Oil	486	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
Main Transformer (near Athletic and Fitness Bldg)	Transformer	T-17	T-16	CSU	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.

*Does not include equipment containing less than 55 gallons oil in reservoirs.

Total = **9,921**

Table 2: Georgia Power Owned Oil or Hazardous Substance-Containing Containers, Storage Capacity, and Secondary Containment
Clayton State University, Morrow, GA

Building Name/Container Location	Tank/Container Type	Map ID	Field ID	Owner	Contents	Total Capacity (gallons)	Secondary Containment
Main Transformer (near Athletic and Fitness Bldg.)	Transformer	T-17	T-16	Ga Power	Mineral Oil	865	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-19	T-2	Ga Power	Mineral Oil	33	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-20	328131	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-21	328130	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-22	28124	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-23	328133	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-24	328132	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-25	328129	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-26	328125	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-27	328126	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-28	328127	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-29	328128	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-30	334061	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-31	3340623	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-32	3344063	Ga Power	Mineral Oil	100	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-33	334063	Ga Power	Mineral Oil	100	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-34	334058	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would drip/drain from the overhead transformer (attached to utility pole) to ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-35	334059	Ga Power	Mineral Oil	100	No Passive Secondary Containment. Spill would drip/drain from the overhead transformer (attached to utility pole) to ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase II)	Transformer	T-36	409477	Ga Power	Mineral Oil	100	No Passive Secondary Containment. Spill would drip/drain from the overhead transformer (attached to utility pole) to ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.
5809 Northlake Dr. (Apartment Complex-Phase I)	Transformer	T-40	328135	Ga Power	Mineral Oil	56	No Passive Secondary Containment. Spill would pool onto concrete pad and then ground surface (grass) before going to storm drain or water body. Facilty utilizing a contingency plan.

*Does not include equipment containing less than 55 gallons oil in reservoirs.

Total = **2,082**

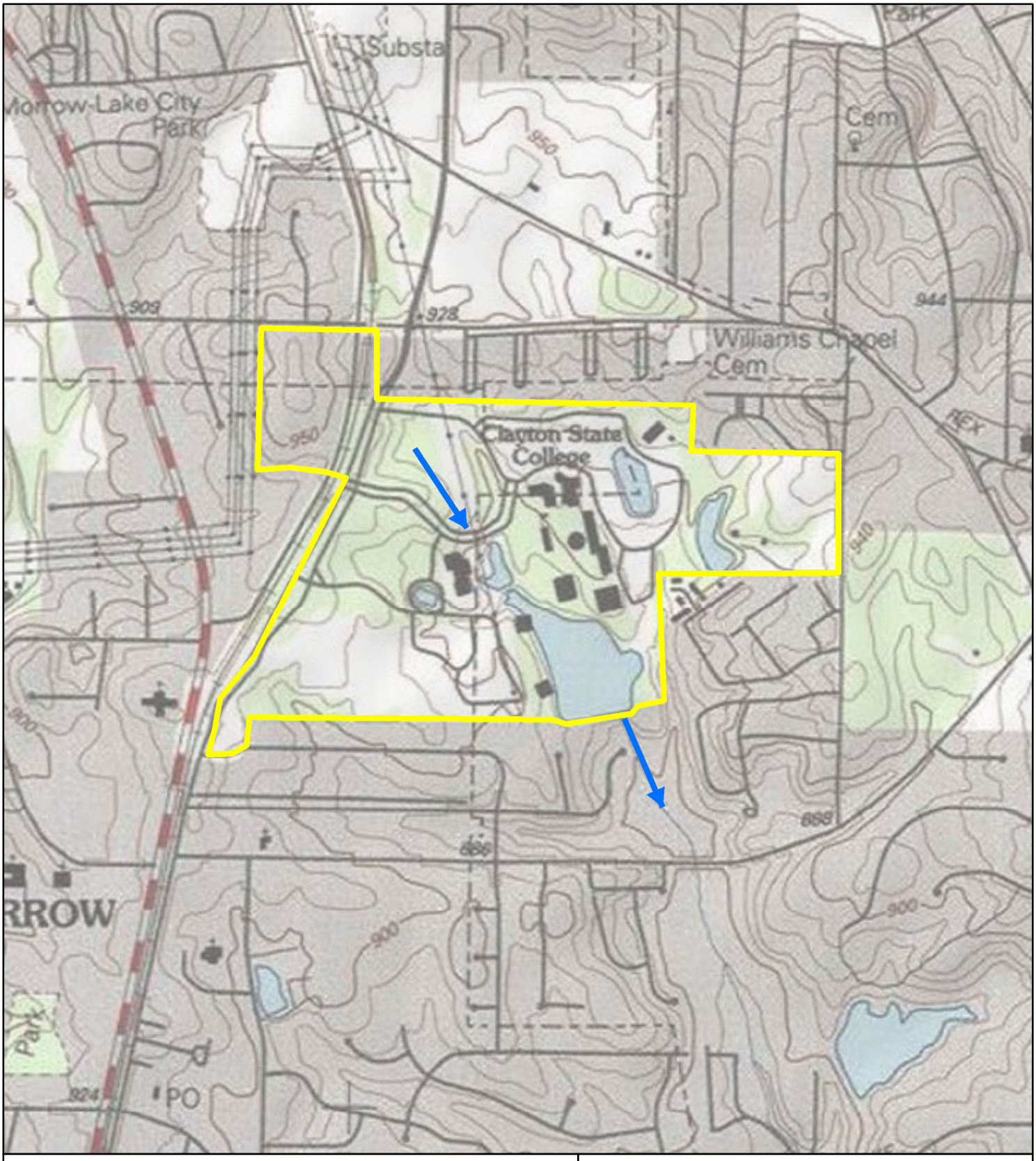
Table 3: Spill Reponse Equipment List
Clayton State University, Morrow, GA

Equipment	Quantity	Locations
Absorbent Pigs/Socks	10	Each Kit; See Locations of Spill Kits on Figures 2-A and 2-B
Small Broom	1	
Dust Pan	1	
Oil-Dry Absorbent	1 bag	
Trash Bags and Ties	12	
Absorbent Pads	1 Box	
Storm Drain Cover	1	
Gloves	1 Box	

Table 4: Spill Prediction Anaylsis
Clayton State University, Morrow, GA

Potential Failure / Location	Failure Type	Predicted Volume Released (gallons)	Predicted Spill Rate	Direction of Flow	Containment
Elevator Reservoir Leak at any location.	Leak, rupture	up to 425 (capacity of largest reservoir)	Gradual seepage to instantaneous spill	Within Elevator Closet (Storage Room with concrete floor and walls).	Concrete room.
Leak at Diesel Above Ground Storage Tank in Maintenance Area.	Leak, rupture	up to 110	Gradual seepage to instantaneous spill	To spill pallet and then to adjacent concrete floor inside before flowing outside to storm drain.	Spill Pallet - Holds up to 120 gallons.
Transformer Leak at any location.	Leak, rupture	up to 865 (capacity of largest transformer)	Gradual seepage to instantaneous spill	To concrete pad and then adjacent ground surface (grass) and then to stormwater drain or Lake.	Land-based spill response capability (spill kits)
Leak at Used Oil Above Ground Storage Tank in Maintenance Area.	Leak, Rupture, Spill during offloading	up to 250	Gradual seepage to instantaneous spill	Adjacent ground surface (concrete) and then to stormwater drain.	Land-based spill response capability (spill kits)
Leak, spill, or overfill at Unleaded Gasoline Above Ground Storage Tank in Maintenance Area.	Leak, Rupture, Spill during offloading or filling of containers	up to 500	Gradual seepage to instantaneous spill	Adjacent ground surface (concrete) and then to stormwater drain.	Land-based spill response capability (spill kits)

FIGURES



Legend

- Approximate Site Boundary
- Drainage Path

N

0 1,000 Feet

Notes:
USGS Topographic Quadrangle(s):
- Jonesboro, GA. 33084-E3

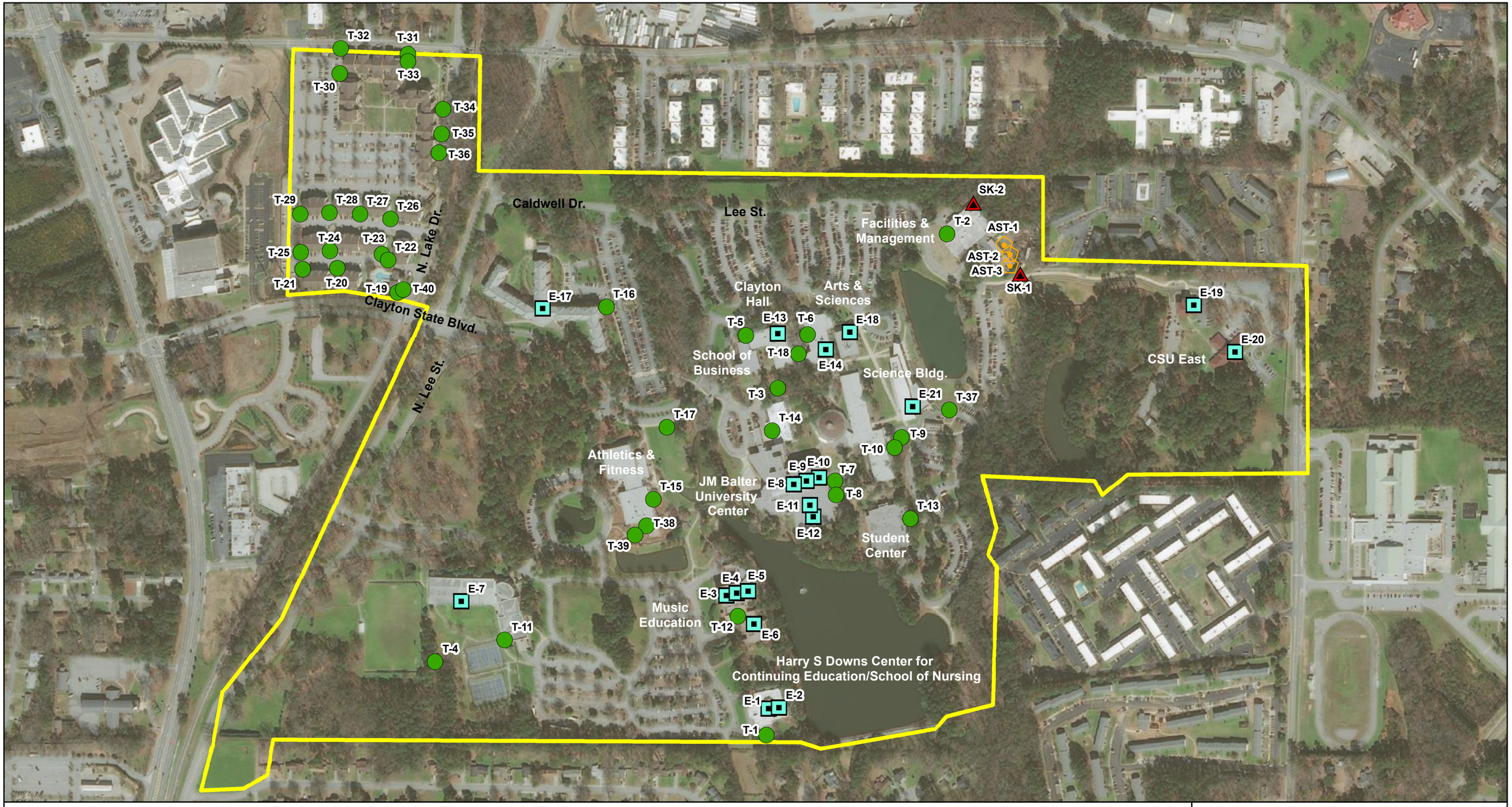
Site Location Map

Clayton State University
Morrow, GA

Geosyntec consultants

Kennesaw, Georgia | June 2021

Figure 1



Legend

- Approximate Site Boundary
- Transformer
- Elevator
- Spill Kit/Supplies
- Above Ground Storage Tank

N

0 400 Feet

Site Layout Map - Main Campus Oil Storage

Clayton State University
Morrow, GA

Geosyntec consultants

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Figure 2A

Legend

- Approximate Site Boundary
- Transformer
- Elevator

N

0 160 Feet

Site Layout Map - Campus Apartments Oil Storage

Clayton State University
Morrow, GA

Geosyntec consultants

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Figure 2B

APPENDIX A

Exceptions to SPCC Plan Engineering Certification

APPENDIX A

EXCEPTIONS TO SPCC PLAN ENGINEERING CERTIFICATION

Clayton State University does not need to perform additional actions to achieve compliance with this Plan.

APPENDIX B

Certification of Substantial Harm Determination

APPENDIX B

CERTIFICATION OF SUBSTANTIAL HARM DETERMINATION

FACILITY NAME: Clayton State University

FACILITY ADDRESS: 2000 Clayton Blvd., Morrow, Georgia 30260

1. Does the facility transfer oil over water to or from vessels and have a total oil storage capacity greater than or equal to 42,000 gallons?

YES_____ NO ____X___

2. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and does the facility lack secondary containment that is sufficiently large to contain the capacity of the largest aboveground oil storage tank plus sufficient freeboard to allow for precipitation within any aboveground storage tank area?

YES_____ NO ____X___

3. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formula[1]) such that a discharge from the facility could cause injury to fish and wildlife and sensitive environments? For further description of fish and wildlife and sensitive environments, see Appendices I, II, and III to DOC/NOAA's "Guidance for Facility and Vessel Response Plans: Fish and Wildlife and Sensitive Environments" (see Appendix E to this part, section 10, or availability) and the applicable Area Contingency Plan.

YES_____ NO ____X___

4. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and is the facility located at a distance (as calculated using the appropriate formula in Attachment C-III to this appendix or a comparable formuls[1]) such that a discharge from the facility would shut down a public drinking water intake[2].

YES_____ NO ____X___

5. Does the facility have a total oil storage capacity greater than or equal to 1 million gallons and has the facility experienced a reportable oil spill in an amount greater than or equal to 10,000 gallons within the last 5 years?

YES_____ NO ____X___

CERTIFICATION

I certify under penalty of law that I have personally examined and am familiar with the information submitted in this document, and that based on my inquiry of those individuals responsible for obtaining this information, I believe that the submitted information is true, accurate, and complete.

Signature	Date
Name (please type or print)	Title of Signatory

[1] If a comparable formula is used, documentation of the reliability and analytical soundness of the comparable formula must be attached to this form.

[2] For the purposes of 40 CFR part 112, public drinking water intakes are analogous to public water systems as described at 40 CFR 143.2(c)

APPENDIX C

SPCC Plan Five-Year Review Certification

APPENDIX C

SPCC PLAN FIVE-YEAR REVIEW CERTIFICATION

In accordance with §112.5(b) this Plan must be reviewed once every five years to determine if more effective prevention and control technology is available to significantly reduce the likelihood of a discharge.

Pursuant to §112.3(d), technical changes to the Plan must be certified by a Professional Engineer. If unsure whether the change is technical or non-technical, the amendment should be certified.

Technical amendment – a change that requires the application of good engineering practice.

Non-technical change – a change to the contact list, more stringent requirements for stormwater discharges to comply with NPDES rules, phone numbers, product changes if new product is compatible with conditions of existing tank and secondary containment, and any other changes which do not materially affect the construction site's potential to discharge oil.

Pursuant to §112.5(b), and by means of this certification, I attest that I have completed a review and evaluation of this SPCC Plan for Clayton State University, and as a result

_____Will amend the Plan within 90 days of my review and implement the amended Plan within six-months of its completion.

_____ Will Not amend the Plan.

_____ _____

Signature Date

_____ _____

Name (please type or print) Title of Signatory

Technical amendments to the Plan have been certified by a Professional Engineer:

Pursuant to §112.3(d)(1) and by means of this certification I attest that: (i) I am familiar with the requirements of the SPCC rule (40 CFR 112); (ii) I or my authorized agent has visited and examined the facility; (iii) the Plan has been prepared in accordance with good engineering practice, including consideration of applicable industry standards, with the requirements of the SPCC rule; (iv) procedures for required inspections and testing have been established; and (v) the Plan is adequate for Clayton State University.

_____

Signature of Registered Professional Engineer

_____

Printed Name of Registered Professional Engineer

Registration No. _____ Registration State_____

APPENDIX D

Inspection Checklists

Weekly Inspection Form
ASTs and Drum
Month:

Date	CSU ID	Location	Gal	Inspected By	Damage? If Yes, Describe.	Visible Leaking? If Yes, Describe.
	AST-1	Facilities - USED OIL	250			
	AST-2	Facilities - GASOLINE	500			
	AST-3	Facilities- DIESEL	110			
	AST-1	Facilities - USED OIL	250			
	AST-2	Facilities - GASOLINE	500			
	AST-3	Facilities- DIESEL	110			
	AST-1	Facilities - USED OIL	250			
	AST-2	Facilities - GASOLINE	500			
	AST-3	Facilities- DIESEL	110			
	AST-1	Facilities - USED OIL	250			
	AST-2	Facilities - GASOLINE	500			
	AST-3	Facilities- DIESEL	110			

Monthly Inspection Form
Elevators
Date:

CSU ID	Location	Gallons	Inspected By	Damage? If Yes, Describe.	Visible Leaking? If Yes, Describe.	Spill Materials Present?
Elevators						
E-1	Harry S. Downs Center (School of Nursing)	100				
E-2	Harry S. Downs Center (School of Nursing)	100				
E-3	Spivey Hall	100				
E-4	Spivey Hall	100				
E-5	Spivey Hall	250				
E-6	Music Education	105				
E-7	Student Activity Center	150				
E-8	James M. Bakers University Center	300				
E-9	Library	300				
E-10	Library	425				
E-11	James M. Bakers University Center	200				
E-12	James M. Bakers University Center	200				
E-13	Clayton Hall	125				
E-14	Arts and Sciences	70				
E-15	Edgewater Hall	80				
E-16	Edgewater Hall	100				
E-17	Laker Hall	100				
E-18	Annex-LAB	80				
E-19	CSU East - Arbor Hall Administration Bldg.	80				
E-20	CSU East - Arbor Hall Multi-purpose Bldg.	80				
E-21	Lakeview Discovery & Science Center	180				

Quarterly Inpsection Form
Transformers
Date:

CSU ID	Location	Gallons	Inspected By	Damage? If Yes, Describe.	Visible Leaking? If Yes, Describe.	Spill Materials Present?
Transformers						
T-1	Continuing Education	211				NA
T-2	Facility Management (Loading Dock)	183				NA
T-3	Administration / Faculty Hall	183				NA
T-4	Tennis Courts/Soccer Field	211				NA
T-5	School of Business	215				NA
T-6	Arts and Sciences	230				NA
T-8	Lower Library (Near Carts)	255				NA
T-9	Central Plant	255				NA
T-9	Central Plant	255				
T-10	Central Plant	255				NA
T-11	Student Activity Center Loading Dock	306				NA
T-12	Music Education Loading Dock	355				NA
T-13	Student Center Loading Dock	429				NA
T-14	UC Loading Dock	493				NA
T-15	Athletic and Fitness Building	186				NA
T-16	Laker Hall	486				NA
T-17	Main Transformer (near Athletic and Fitness Bldg)	56				NA
T-18	Technology / Clayton Hall	235				NA
T-37	Lakeview Discovery & Science Center	476				NA
T-38	Athletic and Fitness Building	255				NA
T-39	Athletic and Fitness Building	306				NA

Quarterly Inpsection Form
Transformers at Apartment Complex (Owned by GA Power)
Date:

CSU ID	Location	Gallons	Inspected By	Damage? If Yes, Describe.	Visible Leaking? If Yes, Describe.	Spill Materials Present?
Transformers						
T-19	5809 Northlake Dr. (Apartment Complex-Phase I)	33				NA
T-20	5810 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-21	5811 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-22	5812 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-23	5813 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-24	5814 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-25	5815 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-26	5816 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-27	5817 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-28	5818 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-29	5819 Northlake Dr. (Apartment Complex-Phase I)	56				NA
T-30	5809 Northlake Dr. (Apartment Complex-Phase II)	56				NA
T-31	5809 Northlake Dr. (Apartment Complex-Phase II)	56				NA
T-32	5809 Northlake Dr. (Apartment Complex-Phase II)	100				NA
T-33	5809 Northlake Dr. (Apartment Complex-Phase II)	100				NA
T-34 (pole-mounted)	5809 Northlake Dr. (Apartment Complex-Phase II)	56				NA
T-35 (pole-mounted)	5809 Northlake Dr. (Apartment Complex-Phase II)	100				NA
T-36 (pole-mounted)	5809 Northlake Dr. (Apartment Complex-Phase II)	100				NA
T-40	5809 Northlake Dr. (Apartment Complex-Phase I)	56				NA

APPENDIX E

Georgia Power Transformer Letter

June 7, 2011

GEORGII'«\. POWER
A SOUTHERN COMPANY

Darren Thomas
Assistant Director - Facilities Management
Clayton State University
Morrow, GA

Dear Mr. Thomas:

This letter is in response to your inquiry regarding the Georgia Power transformers located at the following addresses:

5809 Northlake Drive
Morrow, GA 30260
and
5751 Northlake Drive
Morrow, GA 30260

The transformers currently at this location are untested mineral oil filled units. If you desire additional information or testing for any PCB concentration, Georgia Power Company will provide such informationand testing for a fee to cover expenses of such test. Below are the average gallons of oil for each size transformer on your site. Actual volume depends on specific type design and manufacturer.

5809 Northlake Drive:

50 kVa (padmount)	avg. 33 gallons	(1 on site)
100 kVa (padmount)	avg. 56 gallons	(10 on site)

5751 Northlake Drive:

100 kVa (padmount)	avg. 56 gallons	(2 on site)
167 kVa (padmount)	avg. 100 gallons	(2 on site)
100 kVa (overhead)	avg. 56 gallons	(1 on site)
167 kVa (overhead)	avg. 100 gallons	(2 on site)

Should any dielectric fluid spill occur, it would be handled by Georgia Power Company as per CFR 761.125 and the State of Georgia Oil and Hazardous Substance Release Act of 1991.

Should you have any questions or need additional information, please call me at (404)608-5560.

Sincerely

Brad McBay
Key Account Manager

APPENDIX F

Oil Spill Contingency Plan and Reporting Forms

OIL SPILL CONTINGENCY PLAN

1. RESPONSE MANAGEMENT STRUCTURE

The Spill Coordinator and Alternate Spill Coordinator are responsible for implementing response procedures in the event of an oil spill or discharge emergency. These personnel have the authority to commit the resources necessary to carry out a response and to notify local, state, and regulatory authorities in the event of an emergency. However, oil handling personnel at Clayton State University will receive training to familiarize themselves with aspects of the SPCC Plan, facility operations, the location and characteristics of materials handled at the Site, and the location of records within the facility. Oil handling personnel are responsible for proper implementation of response procedures should the Spill Coordinator or Alternate Spill Coordinator(s) be unavailable.

At all times, there will be at least one person either on the facility premises or on call, who will be responsible for coordinating emergency response measures. Additional contact information is provided in **Appendix G**. In case of a spill emergency during normal work hours, the Emergency Coordinator or his alternate shall be contacted immediately. If the spill occurs during non-business hours, security is to be contacted immediately. If security is not available, contact the Emergency Coordinator:

Lashaundra Fambro	Work:	(678) 466-4868
EHS Coordinator	Alternate:	N/A
Mr. Antonio Long	Work:	(678) 466-4050
Spill Coordinator	Alternate:	(770) 961-3540
Mr. Darren Thomas	Work:	(678) 466-4249
Alternate Spill Coordinator	Alternate:	(404) 520-3490

2. INITIAL RESPONSE

Releases at the Site will be discovered through observations made during the course of normal work activities, inspections of work areas and equipment, monitoring devices, or by chance. Discovering a spill is the first step in initiating a response. The individual discovering a release should immediately upon discovery:

1. Assess the situation.
2. Stop the source of the release if safely possible using available resources, including spill kits (Table 3).
3. Restrict ignition sources if the material is flammable.
4. Secure the area as “off limits”.

5. In the event that the incident poses an immediate threat of fire, explosion, or other impact to safety, health, or the environment, contact the local fire department at 911. DO NOT HANG UP after completing the report, let the dispatcher hang up first.

6. Report the release to the Spill Coordinator or an Alternate Spill Coordinator (see attached Notification Phone Numbers above).

7. The Spill Coordinator (or alternate) will determine whether the spill incident warrants evacuation of the facility. If so, the procedures outlined in the facility Emergency Response Plan will be followed.

8. The Spill Coordinator (or alternate) will determine whether the spill incident constitutes a discharge as defined in §112.1(b) of the SPCC regulations (see Section 3 below) or exceeds a reportable quantity (RQ) and will notify appropriate federal, state, and local agencies of the spill/release incident if warranted.

9. If the spill involves five gallons or less, it can be cleaned up by facility personnel provided that: 1) appropriate Safety Data Sheets (SDS sheets) are available for the material spilled; and 2) appropriate personal protective equipment (PPE) is available.

10. If necessary, the spill may have to be cleaned up by a properly certified outside contractor. (Safety Kleen – 770-960-1275).

Any transformer release should be reported immediately to Georgia Power:

Georgia Power: 1-888-660-5890

The facility has not developed pre-arranged procedures with regulatory or emergency response agencies due to the small volume of oil storage at the facility. The fire department is sufficiently aware of the hazards associated with oil storage at this facility. Coordination for a spill response will take place at the Maintenance Facility, if usable.

3. OIL SPILL EMERGENCY REPORTING

If the spill incident constitutes a discharge as defined in §112.1(b) of the SPCC regulations, it will be considered an Oil Spill Emergency. A discharge involves:

> "discharge oil in quantities that may be harmful, as described in Part 110 of this chapter, into or upon the navigable waters of the United States or adjoining shorelines, or into or upon the waters of the contiguous zone, or in connection with activities under the Outer Continental Shelf Lands Act or the Deepwater Port Act of 1974, or that may affect natural resources belonging to, appertaining to, or under the exclusive management authority of

the United States (including resources under the Magnuson Fishery Conservation and Management Act)".

In summary, if a spill incident directly affects surface water or groundwater at the Site, it must be considered a reportable incident. Reporting and notification requirements for releases are attached.

The following information must be provided to the listed entities:

1. Name, address, and telephone number of person reporting.
2. Name, address, and telephone number of person responsible for the discharge or release, if known.
3. Date and time of the discharge or release.
4. Type or name of substance discharged or released.
5. Estimated amount of the discharge or release.
6. Location or address of discharge or release.
7. Source and cause of the discharge or release.
8. Size and characteristics of area affected by the discharge or release.
9. Containment and cleanup actions taken to date.
10. Other persons or agencies contacted.

4. APPLICABLE FEDERAL REPORTING REQUIREMENTS

The National Response Center (1-800-424-8802) shall be notified immediately for discharges of oil into the navigable waters of the United States, adjoining shorelines, or into waters of the contiguous zone that **(1) violate applicable water quality standards,** or **(2) cause a film or sheen upon or discoloration of the surface of the water or adjoining shorelines or cause a sludge or emulsion to be deposited beneath the surface of the water or upon adjoining shorelines.**

USEPA – Region IV
Waste Management Division
Engineering Response Section
345 Courtland Street NE
Atlanta, Georgia 30365

Federal guidelines also require notification to the GAEPD, as applicable and described in *Section 5*.

5. STATE REPORTING REQUIREMENTS

In addition to the federal reporting requirements, the Georgia Environmental Protection Division (GAEPD) requires that any spill in excess of the reportable quantity, or of an unknown quantity, is reported to them immediately upon release or discovery. In addition, one is required to report any spill hitting water of Georgia that causes a sheen or discoloration. The responsibility to report a spill falls upon the responsible party – or upon the discoverer of a spill. To report, contact the state emergency operations center. The number is listed in **Appendix G**.

Local government authorities (fire department/marshal, law enforcement, health authority, and/or Local Emergency Planning Committee) should be contacted as appropriate.

Notification to property owners and residents should be completed as soon as possible, but no later than 2 weeks, after the discovery of a spill or release if it is reasonably believed that the property is adversely affected.

NOTE ALSO THAT ALL HAZARDOUS CHEMICAL RELEASES THAT EXCEED THE REPORTABLE QUANTITY (RQ) MUST BE REPORTED TO:

Georgia Environmental Protection Division (404) 656-4863
Atlanta Regional Office during work hours (8:00-5:00) Monday-Friday

Georgia Environmental Protection Division (800) 241-4113
24-Hr. Emergency Response

National Response Center (U.S. Coast Guard) (800) 424-8802

Notification updates, that would trigger a change in the response of a spill or discharge, are expected to be communicated as soon as possible, whenever necessary.

6. FOLLOW-UP ACTIVITIES

After the initial response, reporting, and notification associated with a spill incident, the Spill Coordinator (or alternate) will prepare a written report (See Spill Report Form at the end of this Appendix) which includes the following:

1. Time and date of the incident.
2. Source and exact location of the spill.
3. Material involved.
4. Cause of the incident.
5. Estimated spill volume and direction of flow.

6. Names of any waterways involved.
7. Description of media impacted by the spill.
8. Description of damages or injuries caused by the spill.
9. Actions taken to stop, remove, and mitigate the effects of the material spilled.
10. Names of individuals and organizations contacted (time, day, who received call, who called from the Site, and pertinent notes).
11. Who reported to the scene from federal, state, and local agencies (time, day, etc.).

In addition, whenever more than 1,000 gallons of oil are discharged in a single incident or more than 42 gallons of oil have been discharged in each of two incidents over a 12-month period, the Site will submit a report to the U.S. Environmental Protection Agency (USEPA) Regional Administrator (RA) within 60 days as outlined in Section 5.10 of the SPCC Plan.

7. SUSTAINED ACTIONS

Where prolonged mitigation and recovery actions are required in response to a spill or release, the Spill Coordinator (or alternate) will manage the activities with any or all of the following, as warranted:

1. An outside contractor – See list of Clean-up Contractor in the contact list below.
2. An environmental/engineering consultant.
3. Any outside vendor responsible for the incident.
4. The appropriate local, state, and federal agencies.

Most spill/release incidents at the Site are expected to be handled without implementing sustained actions.

Clayton State University
Spill Event and Notification Form for Incidental Releases

Name of Employee or Driver Responsible for Release: _____

Phone: _____

Truck # (if applicable): _____

Name of Company (if not CSU): _____

****

Date of Release: _____ Time of Release: _____

Location of Release: _____

Material/Substance Released: _____ Volume of Release (gallons): _____

Cause/Nature of Release: _____

Did release enter a storm drain or reach a water body?	□ Yes	□ No
Was release cleaned up within 24 hours?	□ Yes	□ No
Was release reported to GA DNR?	□ Yes	□ No
If yes, please provide name of GA DNR staff contacted	_____	
Was release reported to National Response Center (NRC)?	□ Yes	□ No

If yes, please provide incident response number _____

Petroleum-Only Release/Spill Reporting Guideline

The following Releases/Spills MUST BE IMMEDIATELY REPORTED to GA DNR at (404) 656-4863 or (800) 241-4113:

(1) Release/spill that equals or exceeds the reportable quantity or an unknown volume.
(2) Releases/spill of any volume that comes into contact with the ground (ex., grass, soil, dirt).
(3) Release/spill of any volume that reaches a water body or causes a sheen on a water body.

The following Releases/Spills MUST BE IMMEDIATELY REPORTED to GA DNR at (404) 656-4863 AND the National Response Center (NRC) at 1-800-424-8802:

(1) Release/spill of any volume that reaches a water body or causes a sheen on a water body.

Contact CSU Director of Facilities Management at (678) 466-4240 for further assistance.

_____ _____
Signature Date

Appendix F: Spill Log

Date and Time	Location	Type and Source of Spill	Volume of Spill (gallons)	Did spill reach stormdrain or water body? Y or N?	Cause of Spill	Cleaned up within 24 hours? Y or N?	Reported to GAEPD? Y or N?	Reported to NRC? Y or N?

APPENDIX G

Emergency Contact List

Appendix G : Emergency Contacts

Name	Main Contact Number	Alternative Phone Number	Circumstances	When to Notify
Campus Police	(678) 466-4050		Fire or Injury. Contact Campus Police and they will direct Fire Department and/or Ambulance to your location.	As Needed.
Antonio Long, Chief of Police INITIAL CONTACT FOR SPILL	(678) 466-4050	(770) 961-3540	Spill or release to surface water, groundwater, or any connected path that reaches waters of the state (including streams, rivers, storm sewers, and drainage ditches), and causes a sheen.	Immediately (verbal)
Morrow Police Department	911	(770) 961-4006	Spill or release to surface water, groundwater, or any connected path that reaches waters of the state (including streams, rivers, storm sewers, and drainage ditches), and causes a sheen.	As Needed.
Hospital: Southern Regional Medical Ctr 11 Upper Riverdale Rd Riverdale, GA 30274	(770) 991-8000		Injury.	As Needed.
National Response Center c/o U.S. Coast Guard 2100 2nd Street, SW Washington, D.C. 20593-000	(800) 424-8802		Spill or release to surface water, groundwater, or any connected path that reaches waters of the state (including streams, rivers, storm sewers, and drainage ditches), and causes a sheen.	Immediately (verbal)
EPA Region IV (Hotline)	(404) 562-8700		Discharge 1,000 gallons or more; or second discharge of 42 gallons or more over a 12-month period.	Immediately (verbal)
EPA Region IV SPCC/FRP Coordinator U.S. EPA - Region IV 61 Forsyth St. Atlanta, GA 30365-3415	(404) 562-8752		Discharge 1,000 gallons or more; or second discharge of 42 gallons or more over a 12-month period.	Written notification within 60 days
Georgia Department of Natural Resources Environmental Protection Division Emergency Operations Center 2 Martin Luther King Jr. Drive Suite 1252 Atlanta, Georgia 30334	(800) 241-4113	(404) 656-4863	Spill or release to surface water, groundwater, or any connected path that reaches waters of the state (including streams, rivers, storm sewers, and drainage ditches), and causes a sheen.	Immediately (verbal)
Darren Thomas Director of Facilities Management 2000 Clayton State Blvd. Morrow, GA 30260 darrenthomas@clayton.edu	(678) 466-4249	(404) 520-3490	Any discharge.	Immediately (verbal)
Lashaundra Fambro, EHS Coordinator LFambro2@clayton.edu 2000 Clayton State Blvd. Morrow, GA 30260	(678) 466-4868		Any discharge.	Immediately (verbal)
Harun Biswas Assistant Vice President of Facilities Management 2000 Clayton State Blvd. Morrow, GA 30260 HarunBiswas@clayton.edu	(678) 466-4240	(470) 848-3146	Any discharge.	Immediately (verbal)
Used Oil Removal Contractor: Safety Kleen Morrow, GA (S. Atlanta) 7027 Commercial Drive Morrow, GA 30260	(770) 960-1275		Any discharge that exceeds the capacity of facility personnel to respond and cleanup.	As Needed.
Clayton County Water Authority W.B. Casey Water Resource Recovery Facility Water Reclamation Department Manager	(770) 478-7496		Any discharge that enters a sanitary drain.	Immediately (verbal)

APPENDIX H

Annual SPCC Training Documentation and Improvements to SPCC.

SPILL PREVENTION TRAINING ATTENDANCE LOG

INSTRUCTOR:	**DATE:**

EMPLOYEE	**TITLE**	**SIGNATURE**

Note: Affix a copy of the Training Materials, or an outline of the subject matter, and maintain the training roster/documentation in Clayton State University SPCC.

LOG OF IMPROVEMENTS TO SPCC

DATE	DESCRIPTION	SIGNATURE